

FIFRA Combined Case Data Form (CCDF) for Administrative Cases

Request for Docket Assignment and Case Conclusion Data Sheet (CCDS)

REQUEST FOR DOCKET ASSIGNMENT

Enforcement Action Identifier (aka Docket #):	FIFRA-10-2017-0106
Lead Technical Contact:	Chad Schulze
Lead Attorney:	Brett Dugan
Enforcement Action (Case) Name:	Chemsico, a Division of United Industries Corporation
Respondent(s) / Defendants(s):	Randy Lewis, President

- 1. Linked Facilities:** The following site-specific information is required for each facility linked to the case. Insert the appropriate # of Facility tables into your saved copy of this form.

Facility Site Name & Physical Location (Use Location of the Violation):

Commercial Name of the Facility:	Chemsico, a Division of United Industries Corporation					
Street Address:	One Rider Trail Plaza Drive, Suite 300					
City:	Earth City	State:	MO	Zip Code:	63045	

Facility Latitude/Longitude: (Decimal Degrees)

Latitude:	38.759689°	Longitude:	-90.457112°
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Is facility site on a Reservation?

<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes → Enter Reservation Name	
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2. Related Activity: Is this enforcement action a result of an R10 EPA inspection?

<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes → Date of Inspection	9/27/2016
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3. Enforcement Action Type: (Check only one box)

<input type="checkbox"/>	FIFRA Section 17C Importations [Notice of Determination]
<input checked="" type="checkbox"/>	FIFRA 13A AO for Stop Sale, Use or Removal [Administrative Compliance Order]
<input type="checkbox"/>	FIFRA Sec 14A Action for Penalty - Administrative Penalty Order (with or w/o injunctive relief)
<input type="checkbox"/>	EPA/Customs Import Enforcement Action

4. Multi-Regional case? (Select No or Yes)

<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes → Identify Lead Region (and other regions associated with this national case)	
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5. Multi-Media Action? (Select No or Yes)

<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes → Identify all applicable medias	
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6. Federal Statute | Law Section | Program Violated: (Check all applicable.)

<input checked="" type="checkbox"/>	FIFRA: 12A1A: Unregistered Pesticide
<input type="checkbox"/>	FIFRA: 12A1B: Claim Difference: Label, Composition & Other Registration Issues (Not Antimicrobial)
<input type="checkbox"/>	FIFRA: 12A1C: Composition Difference: Label, Composition & Other Registration Issues (Not Antimicrobial)
<input type="checkbox"/>	FIFRA: 12A1D: Colored/Discolored: Label, Composition & Other Registration Issues (Not Antimicrobial)

Federal Statute Law Section Program Violated (continued):	
<input type="checkbox"/>	FIFRA: 12A1E: Adulterated/Misbranded: Label, Composition & Other Registration Issues (Not Antimicrobial)
<input type="checkbox"/>	FIFRA: 12A1F: Devise Misbranded: Label, Composition & Other Registration Issues (Not Antimicrobial)
<input type="checkbox"/>	FIFRA: 12A2A: Label Alter/Detach: Label, Composition & Other Registration Issues (Not Antimicrobial)
<input type="checkbox"/>	FIFRA: 12A2B: Refuse Records, Reports, Entry: Recordkeeping
<input type="checkbox"/>	FIFRA: 12A2C: False Guaranty: Recordkeeping
<input type="checkbox"/>	FIFRA: 12A2D: Confidential Information Revealed: Recordkeeping
<input type="checkbox"/>	FIFRA: 12A2E: Advertise without Classification: Label, Composition & Other Registration Issues (Not Antimicrobial)
<input type="checkbox"/>	FIFRA: 12A2F: Restricted Usage: Label, Composition & Other Registration Issues (Not Antimicrobial)
<input type="checkbox"/>	FIFRA: 12A2G: Misuse
<input type="checkbox"/>	FIFRA: 12A2H: Contrary Use - Experimental Permit: Misuse
<input type="checkbox"/>	FIFRA: 12A2I: Violate SSUR Order: Label, Composition & Other Registration Issues (Not Antimicrobial)
<input type="checkbox"/>	FIFRA: 12A2J: Violate Suspension Order: Label, Composition & Other Registration Issues (Not Antimicrobial)
<input type="checkbox"/>	FIFRA: 12A2K: Violate Cancellation Order: Label, Composition & Other Registration Issues (Not Antimicrobial)
<input type="checkbox"/>	FIFRA: 12A2L: Establishment Registration: Recordkeeping
<input type="checkbox"/>	FIFRA: 12A2M: Falsify Application, Information, etc.: Recordkeeping
<input type="checkbox"/>	FIFRA: 12A2N: Failure to File Reports: Recordkeeping
<input type="checkbox"/>	FIFRA: 12A2O: Add/Remove Substance: Label, Composition & Other Registration Issues (Not Antimicrobial)
<input type="checkbox"/>	FIFRA: 12A2P: Test Pesticides on Humans: Good Laboratory Practices
<input type="checkbox"/>	FIFRA: 12A2Q: Falsify Testing Information: Good Laboratory Practices
<input type="checkbox"/>	FIFRA: 12A2R: Falsify Registration Data: Recordkeeping
<input type="checkbox"/>	FIFRA: 12A2S: Violate Regulations Under 3(a) or 19: Label, Composition & Other Registration Issues (Not Antimicrobial)

7. Violation Type: *(Check all applicable)*

<input type="checkbox"/>	Add To/Take From a Pesticide to Defeat Act	<input type="checkbox"/>	Decontamination	<input type="checkbox"/>	Failure/Refusal to Prepare/Keep Records
<input type="checkbox"/>	Advertised Pesticide for Unregistered Use	<input type="checkbox"/>	Emergency Assistance	<input type="checkbox"/>	Falsify Applications, Reports, Information
<input checked="" type="checkbox"/>	Advertised Pesticide Not Registered	<input type="checkbox"/>	Establishment Not Registered (Section 7)	<input type="checkbox"/>	FIFRA Packaging Requirements
<input type="checkbox"/>	Adulterated	<input type="checkbox"/>	Export Notification - failure to notify	<input type="checkbox"/>	Fumigant Application in Greenhouses
<input type="checkbox"/>	Claims Differ	<input type="checkbox"/>	Exports Violation	<input type="checkbox"/>	General Facility Requirements
<input type="checkbox"/>	Composition Differs	<input type="checkbox"/>	Failure to Give Restricted Use Classification	<input type="checkbox"/>	General entry restrictions
<input type="checkbox"/>	Contact with Highly Toxic Pesticides	<input type="checkbox"/>	Failure to Notify	<input type="checkbox"/>	Good Laboratory Practices
<input type="checkbox"/>	Contact with workers and other persons	<input type="checkbox"/>	Failure to Report Information as Required	<input type="checkbox"/>	Greenhouses, Failed to restrict any person
<input type="checkbox"/>	Container Requirements	<input type="checkbox"/>	Failure to Submit Section 6(g) Notice	<input type="checkbox"/>	Greenhouses, Failed to restrict any worker

Violation Type (continued): <i>(Check all applicable)</i>					
<input type="checkbox"/>	Handler Notification	<input type="checkbox"/>	Misbranded - Not Registered for Use in USA	<input type="checkbox"/>	Record Keeping Violations
<input type="checkbox"/>	High Level GLP Violation Misrepresented	<input type="checkbox"/>	Misbranded - Package Does Not Conform	<input type="checkbox"/>	Refusal to Allow Inspection or Sampling
<input type="checkbox"/>	Imports Violation	<input type="checkbox"/>	Misbranded - Technical Errors with no diminishment	<input type="checkbox"/>	Refusal to Submit Reports
<input type="checkbox"/>	Labeling/Marking Requirements	<input type="checkbox"/>	Misbranded - WPS reference statement contains errors	<input type="checkbox"/>	Refusal to Submit Rpts re Adverse Affect
<input type="checkbox"/>	Late Reporting	<input type="checkbox"/>	Misbranded - WPS reference statement is incomplete	<input type="checkbox"/>	REI statements
<input type="checkbox"/>	Low Level GLP Violation by 14(a)(1)	<input type="checkbox"/>	Misuse of a Registered Pesticide	<input type="checkbox"/>	Safety instructions
<input type="checkbox"/>	Low Level GLP Violation by 14(a)(2)	<input type="checkbox"/>	Misuse Pesticide Under Experimental Permit	<input type="checkbox"/>	Safety training
<input type="checkbox"/>	Maintenance	<input type="checkbox"/>	Nonreporting/Failure to Rept to EPA	<input checked="" type="checkbox"/>	Sec 3(a) Violation - Unregistered Pesticide
<input type="checkbox"/>	Microbial Violations	<input type="checkbox"/>	No Records for Restricted Use Pesticide	<input type="checkbox"/>	Sec 7 Report Incomplete - Major Omissions
<input type="checkbox"/>	Mid Level GLP Violation Misrepresented	<input type="checkbox"/>	Notification on farms - in nurseries - or in forests	<input type="checkbox"/>	Sec 7 Report Incomplete - Minor Omissions
<input type="checkbox"/>	Misbranded - Directions for Use Not Adequate	<input type="checkbox"/>	Notification to workers: Greenhouses	<input type="checkbox"/>	Sec 7 Report Not Submitted or Notably Late
<input type="checkbox"/>	Misbranded - Failed to bear product designation	<input type="checkbox"/>	Notification-to-workers statements	<input type="checkbox"/>	Section 6(g) Notice Incomplete/Incorrect
<input type="checkbox"/>	Misbranded - Failed to bear Spanish Signal Word	<input type="checkbox"/>	Nozzle Flow Rate	<input type="checkbox"/>	Section 6(g) Notice Notably Late
<input type="checkbox"/>	Misbranded - Failed to bear state restrictions	<input checked="" type="checkbox"/>	Pesticide Not Registered	<input type="checkbox"/>	Submission of False Registration Data
<input type="checkbox"/>	Misbranded - Failed to bear WPS reference statement	<input type="checkbox"/>	Pesticide Safety Trainer	<input type="checkbox"/>	Test Pesticide on Humans in Violation of Act
<input type="checkbox"/>	Misbranded - False Claim on Label	<input type="checkbox"/>	Posting	<input type="checkbox"/>	Testing Information Was Falsified
<input type="checkbox"/>	Misbranded - Imitation of Another Pesticide	<input type="checkbox"/>	Posting pesticide safety information	<input type="checkbox"/>	Unauthorized Use of Confidential Information
<input type="checkbox"/>	Misbranded - Inadequate Precautionary Labeling	<input type="checkbox"/>	PPE heat-related illness	<input type="checkbox"/>	Unlawful to Detach, Alter, Deface, or Destroyed
<input type="checkbox"/>	Misbranded - Ingredient Statement Not on Container	<input type="checkbox"/>	PPE maintenance. Failed to assure cleaning/maintenance	<input type="checkbox"/>	Use/Make Avail. For Use Restricted Product
<input type="checkbox"/>	Misbranded - Label Does Not Bear Regis.#	<input type="checkbox"/>	PPE requirements. Failed to assure correct PPE use	<input type="checkbox"/>	Violate Cancellation Order - Adverse Effects
<input type="checkbox"/>	Misbranded - Labeling Does Not Bear Use	<input type="checkbox"/>	PPE requirements. Failed to provide appropriate PPE	<input type="checkbox"/>	Violate Cancellation Order - Other Effects
<input type="checkbox"/>	Misbranded - Label lacks Poison Information	<input type="checkbox"/>	PPE requirements. Failed to use clothing and PPE	<input type="checkbox"/>	Violate Sec 13 Order (Stop Sale/Use, Rem)
<input type="checkbox"/>	Misbranded - Labeling Incomplete	<input type="checkbox"/>	PPE statements	<input type="checkbox"/>	Violations of Requirement to Monitor/Maintain Records
<input type="checkbox"/>	Misbranded - Lack of Prominence	<input type="checkbox"/>	Product Not Colored	<input type="checkbox"/>	Worker Protection Standards

8. Proposed Cash Civil Penalty Amount Sought:

\$NA

9. Environmental Justice Indicators: CTRL+Click to open this link: [R10 EJScreen](#). Each facility/location linked to this enforcement action has the potential for raising an EJ concern. The following information must be reported for each facility. Insert the appropriate # of Facility tables into your saved copy of this form.

EJ Table 1: Facility Name & Address:

Commercial Name of the Facility:					
Street Address:					
City:		State:		Zip Code:	

EJ Table 2: Correct Location for Purposes of the EJ Screening (basic or enhanced) (Check only one box)

<input type="checkbox"/>	the location of the ICIS-linked facility
<input type="checkbox"/>	the location of the impact of the violation(s) → If checked, enter the Alternate location into text box below
<input type="checkbox"/>	the location of the violation(s) → If checked, enter the Alternate location into text box below
<input type="checkbox"/>	Alternate location: Where a location other than that associated with the ICIS-linked facility is used for the EJ screening, an explanation for use of the “Alternate location” must be included in the “Explanation of Basis” response in EJ Table 6. <div style="border: 1px solid black; height: 20px; width: 100%;"></div>

EJ Table 3: EJSCREEN Flag (Manual) (Check only one box)

<input type="checkbox"/>	YES	→ If checked, proceed to EJ Table 4 & check the applicable “ YES Enhanced Review ” response
<input type="checkbox"/>	NO	→ If checked, proceed to EJ Table 4 & check the applicable “ YES/NO Enhanced Review ” response
<input checked="" type="checkbox"/>	Exempt	→ If checked, skip EJ Tables 4-5 & proceed to EJ Table 6 & check “ Exempt from Required EJ Review ”

EJ Table 4: Enhanced Review for Potential EJ Concerns (Check only one box)

<input type="checkbox"/>	YES Enhanced Review - Potential EJ Concern Found	→ If checked, proceed to EJ Table 5
<input type="checkbox"/>	YES Enhanced Review - Potential EJ Concern Not Found	→ If checked, proceed to EJ Table 5
<input checked="" type="checkbox"/>	NO No Enhanced Review. If you selected No in Table 3 <u>and</u> you do not have any EJ concerns, select No here. If you do have EJ concerns despite the EJSCREEN No score, you can request an enhanced review based on your knowledge of the facility/area	→ If checked, skip EJ Tables 5-6 & proceed to next section

EJ Table 5: Basis of EJ Determination (Check all that apply based on EJ review then proceed to EJ Table 6)

<input type="checkbox"/>	Community self-identification
<input checked="" type="checkbox"/>	EJSCREEN data
<input type="checkbox"/>	EPA knowledge of community/location (including inspector observation)
<input type="checkbox"/>	Other federal government knowledge of community/location
<input type="checkbox"/>	Public input
<input type="checkbox"/>	State/local/tribal government knowledge of community/location

EJ Table 6: Explanation of Basis for Potential EJ Concern Finding or Exemption from EJ Review. Select the applicable “R10 Tier 1/ 2” response or “Exempt”. *(Check only one box).*

<input type="checkbox"/>	R10 Tier 1 Review: Potential EJ Concern Found	<input type="checkbox"/>	R10 Tier 2 Review: Potential EJ Concern Found
<input type="checkbox"/>	R10 Tier 1 Review: Potential EJ Concern <u>Not</u> Found	<input type="checkbox"/>	R10 Tier 2 Review: Potential EJ Concern <u>Not</u> Found

For Tier 1/2 Review: **forward your Tier 1/2 EJSscreen review results to your Data Manager.**

☒ **Exempt from Required EJ Review:** Cases that qualify as exempt from EJ review, determined on a case-by-case basis, are those that lack a meaningful facility location for the enforcement action for EJ purposes. ➔ *For Exempt, provide the following information*

Criteria: Select the “meaningful location” **criteria** used to make this exempt determination *(Check only one box)*

<input type="checkbox"/>	the location of the violation, or location of identification of the violations, is not relevant to an EJ analysis
<input type="checkbox"/>	the location of the violations is such that the violations can’t affect a community
<input type="checkbox"/>	the location of the facility is not relevant (or is minimally relevant) to the enforcement action

Basis (case type): Applying the above criteria, select the **basis** for this exemption *(Check only one box)*

<input type="checkbox"/>	Import violations (stopped at customs before entering the U.S.)
<input checked="" type="checkbox"/>	FIFRA registration violations
<input type="checkbox"/>	FIFRA mislabeling violations
<input checked="" type="checkbox"/>	FIFRA violations concerning advertising of products
<input type="checkbox"/>	Referral for enforcement of previously issued administrative order
<input checked="" type="checkbox"/>	FIFRA stop sale orders (with no specific location)

Explanation: This explanation should have 2-3 sentences which give case-specific details regarding the exemption. Example: *The JJB fishing vessel is exempt from EJ review because it is an off-shore seafood processing vessel from which there has been no on-shore impact. Therefore, there is no meaningful location for an EJ analysis.*

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10. Federal Facility Activity: *(Check only one box)*

<input checked="" type="checkbox"/>	No Federal Facility Involvement (no federal agency or federal property are involved)
<input type="checkbox"/>	Non-Federal Party Impacting Federal Property (activity involving contractors on federal property or spills migrating to federal property) ➔ If checked, describe the Federal Property being “impacted” (i.e., National Forest, BLM land, etc.):
<input type="checkbox"/>	Federal Facility (traditional federal facility, military base, federal land or federal agency impacting private property)

11. Enforcement Case Summary (for Data FIFRA Violations Manager only):

12. Sensitive Comments: (Optional): Enforcement sensitive information reported in the text box below will be entered into the “Sensitive Comments” screen in ICIS will **not** be released to the Public via ECHO.

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13. Large Environmental Benefit Case? *(Select To be determined, No or Yes)*

Defined as any federal enforcement case with *estimated* environmental benefits of **5 million or more units** (e.g., pounds, cubic yards, acres, etc.).

<input type="checkbox"/>	To be determined		
<input checked="" type="checkbox"/>	No		
<input type="checkbox"/>	<p>Yes → If checked, the <i>case officer</i> must email their calculations for review and approval to OECA-OC's Donna Inman at Inman.donna@epa.gov (cc'ing the/ir Unit Manager, OCE Enforcement Coordinator, & Data Manager) prior to the public release of the environmental benefits numbers via a Press Release, public EPA website, or entry of the information into ICIS. When submitting the calculations, HQ requests you indicate in the subject of the email message the enforcement case name and the words "EB calculations" to ensure a timely response.</p> <table border="1" style="width: 100%;"> <tr> <td style="width: 80%;"> "EB Calculations" emailed to inman.donna@epa.gov for review & approval on: (mm/dd/yyyy) </td> <td style="width: 20%;"></td> </tr> </table>	"EB Calculations" emailed to inman.donna@epa.gov for review & approval on: (mm/dd/yyyy)	
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CASE CONCLUSION DATA SHEET

CTRL+Click to open these links: [FY14 CCDS Guidance \(pdf\)](#)

1. Enforcement Action Identifier (aka Docket #):

<input checked="" type="checkbox"/>	Same as "Request for Docket Assignment"
<input type="checkbox"/>	Other → If checked, enter the new Docket Number assigned for this Final Order:

Note: we do not need to assign a new docket number for judicial enforcement actions. A new docket number only needs to be assigned if the CAFO or ESA isn't filed before the end of the FY. (An exception would be if a Compliant, Compliance Order and Notice of Opportunity for Hearing was filed in one FY and the Final Order filed in the next FY: in that case, a new docket number would not be assigned.)

2. Law Sections Violated: *(Check only one box)*

<input checked="" type="checkbox"/>	Same as "Request for Docket Assignment"
<input type="checkbox"/>	Other → If checked, enter the Law Sections Violated named in the Final Order:

3. Final Order Type: *(Check only one box)*

<input checked="" type="checkbox"/>	Administrative Compliance Orders
<input type="checkbox"/>	Administrative Penalty Order With or Without Injunctive Relief
<input type="checkbox"/>	Amendment to Administrative Order or Consent Agreement
<input type="checkbox"/>	Non-Lead Participant in Multi-Regional Case

4. Date Action Taken:

/(mm/dd/yyyy)

For CAFOs, used Filed Date. For APOs, use date issued.	08/29/2017
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5. Tracking Measures:

<u>Compliance Schedule Event</u>	<u>Schedule Date (mm/dd/yyyy)</u>
Pay Required Civil Penalty Amount in Full	
Scheduled Payment Dates, if applicable	
Complete Required SEP → If applicable, the SEP Information in CCDS line 11 must also be reported	
Achieve Final Compliance With All Obligations Under This Order	10/4/2017

6. Supplemental Environmental Project (SEP): Reminder: Mitigation actions/projects are to be reported

as Injunctive Relief, and not as SEPs.

Is Environmental Justice addressed (as part of the SEP)? ☐ No ☐ Yes

SEP Description: *(Briefly identify what activities are included as part of the SEP & the purpose of those activities)*

SEP Category: *(Check all applicable)*

<input type="checkbox"/>	Assessments & Audits	<input type="checkbox"/>	Pollution Prevention/Improved Housekeeping/O&M, Training, Inventory Control*
<input type="checkbox"/>	Emergency Planning & Preparedness	<input type="checkbox"/>	Pollution Prevention/In-Process Recycling*
<input type="checkbox"/>	Environmental Compliance Promotion	<input type="checkbox"/>	Pollution Prevention/Process-Procedure Modification*
<input type="checkbox"/>	Environmental Restoration & Protection	<input type="checkbox"/>	Pollution Prevention/Product Reformulation/Redesign*
<input type="checkbox"/>	Other Program Specific SEP	<input type="checkbox"/>	Pollution Prevention/Raw Materials Substitution*
<input type="checkbox"/>	Pollution Prevention/Energy Efficiency-Conservation*	<input type="checkbox"/>	Pollution Reduction*
<input type="checkbox"/>	Pollution Prevention/Equipment-Technology Modification*	<input type="checkbox"/>	Public Health

** These SEP categories require Quantitative pollutant-specific data*

Quantitative Environmental Impact of SEP(s): Provide the following Quantitative Environmental Impact pollutant data for each SEP Category with a * selected in Table above. *Insert the appropriate # of SEP Category/Pollutant tables into your saved copy of this form.*

CTRL+Click to open this link: [Pollutants Reference Table \(pdf 12-29-15\)](#) for list of available Pollutants. Include the complete Pollutant Description, not the Pollutant Code.

CTRL+Click to open this link: [CCDS Environmental Benefits Decision Tool](#)

SEP Category: <i>Specify in this text box</i> ➔			
Pollutant	Environmental Benefit Amount	Unit	Media Affected

PROJECT Model Value: *(the minimum amount that must be expended on the SEP by the violator)*

\$

7. **Complying Actions/Injunctive Relief (Non-SEP):** Provide the **total** actual cost of implementation of the actions selected in Table 2 below for Outcome Categories 1-3. Actual cost data supplied by violator is preferred figure.

\$ TBD

Outcome Category & Complying Action: What action did the violator accomplish prior to receipt of settlement/order or will take to return to compliance or meet additional requirements (other than what has already been reported on the Inspection Conclusion Data Sheet (ICDS)). This may be due to settlement/order requirements or otherwise required by statute or regulation (e.g. actions related to an APO which did not specify compliance requirements).

For Outcome Categories 1-2, do not select more than one complying action if there is only one pollutant. According to the FY12 CCDS guidance, a unique pollutant amount is to be entered in ICIS in association with one complying action. The most immediate action taken to address the pollutant should be reported. If there is more than one complying action and more than one type of pollutant, identify which pollutant should be linked to which complying action.

Outcome Category 1: Reduction of Ongoing Releases (Quantitative)

Complying Actions: (Check all applicable)

<input type="checkbox"/>	Reduction - Cease Pesticides Sale, Distribution	<input type="checkbox"/>	Reduction - Pesticide Destroyed (in commerce)
<input type="checkbox"/>	Reduction - Import Pesticide Return to Foreign Origin	<input checked="" type="checkbox"/>	Reduction - Pesticide Returned to Compliance by Manufacturer/Producer (Domestic)
<input type="checkbox"/>	Reduction - Pesticide Advertising Claim Removed	<input type="checkbox"/>	Reduction - Proper Pesticide Use
<input type="checkbox"/>	Reduction - Pesticide Container Change (ongoing)	<input type="checkbox"/>	Reduction - Secondary Containment Change (ongoing)

Quantitative Environmental Impact List: Provide the following Quantitative Environmental Impact pollutant data. CTRL+Click to open this link: [Pollutants Reference Table \(pdf 12-29-15\)](#) for list of available Pollutants. Include the complete Pollutant Description, not the Pollutant Code.

CTRL+Click to open this link: [CCDS Environmental Benefits Decision Tool](#)

Pollutant	Environmental Benefit Amount	Unit	Impacted Media
Pesticide General	TBD	Lbs	Land, Human

Outcome Category 2: Prevention of Future Releases (Quantitative)

Complying Actions: (Check all applicable)

<input type="checkbox"/>	Prevention - Pesticide Advertising Claim Removed (Future Production)	<input checked="" type="checkbox"/>	Prevention - Pesticide Manufacturing Change
<input type="checkbox"/>	Prevention - Pesticide Container Change	<input type="checkbox"/>	Prevention - Pesticide Production Ceased
<input type="checkbox"/>	Prevention - Pesticide Label Revised (Future Production)	<input type="checkbox"/>	Prevention - Pesticide Secondary Containment Change

Quantitative Environmental Impact List: Provide the following Quantitative Environmental Impact pollutant data. CTRL+Click to open this link: [Pollutants Reference Table \(pdf 12-29-15\)](#) for list of available Pollutants. Include the complete Pollutant Description, not the Pollutant Code.

CTRL+Click to open this link: [CCDS Environmental Benefits Decision Tool](#)

Pollutant	Environmental Benefit Amount	Unit	Impacted Media
Pesticide, General	TBD	Lbs	Land, Human

[CBI Note]

Outcome Category 3: Work Practices (Non-Quantitative)

CTRL+Click to open this link in order to view programmatic specific Work Practices: [FY14 CCDS Guidance \(pdf\)](#)

Complying Actions (*Check all applicable*)

<input type="checkbox"/> Auditing	<input checked="" type="checkbox"/> Labeling - Identification	<input type="checkbox"/> Product Registration
<input type="checkbox"/> Certification and Accreditation	<input type="checkbox"/> Labeling - Material Management	<input type="checkbox"/> Provide Site Access
<input type="checkbox"/> Environmental Management Review	<input type="checkbox"/> Manifesting	<input type="checkbox"/> Recordkeeping
<input type="checkbox"/> FIFRA Establishment Registration Obtained	<input type="checkbox"/> Monitoring	<input type="checkbox"/> Reporting
<input type="checkbox"/> FIFRA Establishment Terminated	<input type="checkbox"/> Notification	<input checked="" type="checkbox"/> Testing/Sampling
<input type="checkbox"/> Financial Responsibility Requirements	<input type="checkbox"/> Permitting	<input type="checkbox"/> Training
<input type="checkbox"/> Information Letter Response	<input type="checkbox"/> Pesticide Claim Removed	<input checked="" type="checkbox"/> Work Practices
<input type="checkbox"/> Institutional Controls	<input type="checkbox"/> Planning	

- 8. Cash Civil Penalty Amount Required-by Statute:** This is the total **Federal** penalty assessed against the defendant(s)/respondent(s) required in the final order and is allocated by statute. **Do not include** the amount of the penalty mitigated due to a SEP; the amount shared with a state/local agency; nor **the interest payments associated with a penalty paid over time.** \$

- 9. Enforcement Case Summary for Public Distribution (via ECHO): (*Required*)** Copy and paste the case summary from the **OECA Weekly** into the text box below.

10. Large Environmental Benefit Case? (*No or Yes*)

Defined as any federal enforcement case with *estimated* environmental benefits of **5 million or more units** (e.g., pounds, cubic yards, acres, etc.).

<input type="checkbox"/>	No				
<input type="checkbox"/>	<p>Yes → If checked, the <i>case officer</i> must email their calculations for review and approval to OECA-OC's Donna Inman at inman.donna@epa.gov (cc'ing their Unit Manager, OCE Enforcement Coordinator, & Data Manager) prior to the public release of the environmental benefits numbers via a Press Release, public EPA website, or entry of the information into ICIS. When submitting the calculations, HQ requests you indicate in the subject of the email message the enforcement case name and the words "EB calculations" to ensure a timely response.</p> <table border="1"> <tr> <td>"EB Calculations" emailed to inman.donna@epa.gov for review & approval on: (mm/dd/yyyy)</td> <td></td> </tr> <tr> <td>OECA approved "EB Calculations" on: (mm/dd/yyyy)</td> <td></td> </tr> </table>	"EB Calculations" emailed to inman.donna@epa.gov for review & approval on: (mm/dd/yyyy)		OECA approved "EB Calculations" on: (mm/dd/yyyy)	
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